



Oregon

Theodore R. Kulongoski, Governor

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July 3, 2006

Kristine Koch
Remedial Project Manager
U.S. Environmental Protection Agency
1200 Sixth Avenue, M/S ECL-115
Seattle, WA 98101

RE: Milestone Report for Upland Source Control at the Portland Harbor Superfund Site

Dear Ms. Koch,

DEQ submits the attached *Milestone Report for Upland Source Control at the Portland Harbor Superfund Site*, dated June 2006, to EPA as required by the Portland Harbor Joint Source Control Strategy (JSCS), which was finalized in December 2005. This is the second Milestone Report prepared by DEQ; the first was submitted in March 2006. Three hard copies of the report are included for your convenience, and DEQ will provide hard copies to EPA partners and members of the public upon request as well. The report will also be posted on DEQ's web site within the next week.¹

DEQ appreciated EPA's comments on the March 2006 Milestone Report, and DEQ managers and staff discussed all of EPA's suggestions and questions raised. In meetings with you on May 8 and with EPA partners on May 25, we discussed comments with both EPA and EPA partners. As a result, DEQ decided to make a number of changes to the format and content of the Milestone Report, as summarized below.

Changes made in response to EPA and EPA partner comments

- Modified *Section 2: Identifying Potential Sources of Contamination in Portland Harbor* to describe only DEQ's current site discovery process (the March 2006 Milestone Report described DEQ's site discovery process both before the 2000 Superfund listing and after the listing).
- Removed Tables 1, 2 and 3 from the June 2006 Milestone Report (these tables provided information about DEQ's site discovery process before the 2000 Superfund listing).
- Added text to *Section 6: Issues Encountered in Source Control Work* providing more information on the sites that DEQ identified for accelerated source control work, including a statement of the problem(s) at each site and DEQ's approach for addressing the problem(s).

¹ Milestone Reports are available at www.deq.state.or.us/nwr/PortlandHarbor/JSCS.htm.



- Provided color coding in Table 1 to indicate high, medium and low priority sites (*note: Table 1 was previously titled Table 4 in the March 2006 report*).
- Provided more information where possible in Table 1 to clarify schedules for expected source control work.
- Provided more information where possible in Table 1 to better describe *interim* source control actions that are occurring or have occurred at sites, even if formal source control alternative evaluations have not yet been conducted.
- Updated the "date last modified" column in Table 1 to indicate information that has changed for each site since the March 2006 report.
- Added a footnote to the end of Table 1 that lists sites in Portland Harbor that DEQ has screened and determined that they are *not* potential sources of contamination to the river.
- Added text in *Section 9: Information about Table 1* to (1) clarify that sites in Table 1 are listed by river mile, (2) better describe DEQ's basis for determining whether source control is needed at each site, and (3) define "insignificant pathway" as it is used in Table 1.

In addition, DEQ acknowledges EPA's request for more information about the status and progress of evaluation and control measures at individual stormwater basins that are covered by the City of Portland Outfall project. DEQ received a similar comment from the Port of Portland. We are in the process of working with the City to develop a tracking and reporting format for stormwater basin evaluation and control, and updates on the progress of this effort will be provided in future Milestone Reports.

Also, a suggestion was made by EPA's partner, Environment International, to include in the Milestone Report a map of all the sites listed in Table 1. DEQ agrees that a map would be helpful, and we plan to develop and include a map of sites in the December 2006 report.

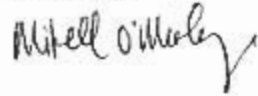
As you review the June 2006 Milestone Report, please contact Jim Anderson, Portland Harbor Project Manager, with any additional suggestions or comments.

Frequency of future Milestone Reports

The 2001 MOU states that "annually, DEQ will prepare and provide to EPA and the TCT a milestone report summarizing the status of DEQ source control activities." The 2005 JSCS, however, calls for Milestone Reports to be submitted to EPA on a quarterly basis. Given limited DEQ staff resources, and recognizing that the overall status of source control work in the Harbor does not change significantly on a quarterly basis, DEQ has decided that we will begin submitting Milestone Reports to EPA on a biannual basis – once every six months. Biannual reports will assist EPA, EPA partners and the public in discerning significant changes in source control activities over time, thus making the best use of everyone's limited time and resources. Accordingly, DEQ will submit the third Milestone Report to EPA in December 2006.

Thank you for your continued assistance in coordinating EPA's support to DEQ on Portland Harbor source control work. Please let us know if you would like to convene a meeting with DEQ and interested EPA partners to discuss the June 2006 Milestone Report, including site prioritization and source control progress.

Sincerely,



Mikell O'Mealy
Portland Harbor Project Outreach Coordinator

Cc: Jim Anderson, Portland Harbor Project Manager, DEQ/NWR
Matt McClincy, Portland Harbor Project Technical Coordinator, DEQ/NWR